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700 13th Street, NW
Suite 600
Washington, D.C. 20005-3960

+1.202.654.6200
+1.202.654.6211
PerkinsCoie.com

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December 22, 2016

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

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election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived."¹ The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case.² These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures, while the second were not, according to the Act and Commission regulations.³

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies; above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

¹ 11 C.F.R. § 106.1(a)(1).

² See Scott Bland, *Dems use loophole to pump millions into fight for the House*, Politico, Oct. 18, 2016, <http://www.politico.com/story/2016/10/democrats-house-campaign-money-229957>.

³ See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.⁴

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters.⁵ FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

FACTS

The DCCC is the House campaign committee of the Democratic Party.⁶ Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.⁷

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

⁴ See *Colorado Republican Fed. Campaign Comm. v. FEC*, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); *McConnell v. FEC*, 540 U.S. 93, 214 (2003), *overruled in part on other grounds by Citizens United v. FEC*, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

⁵ See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

⁶ See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

⁷ See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

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These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase.⁸ Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., “Vote No on [Republican congressional candidate] and Donald Trump”). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure.⁹ Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.¹⁰
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump’s defeat. Rather, these ads focused on Trump’s positions on key issues like national security, immigration, women’s health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits.¹¹ The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump’s defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188.¹²

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

⁸ See Exhibit A (affidavit of Michael Ian Russell).

⁹ See Exhibit B (relevant pages of FEC reports).

¹⁰ The advertisement in MUR 7169 can be found here: <https://www.youtube.com/watch?v=7mb2DsowG00>. The advertisement in MUR 7170 can be found here: <https://www.youtube.com/watch?v=ulkmwN7ivMU>. The advertisement in MUR 7171 can be found here: <https://www.youtube.com/watch?v=LS-gU95vm9U>. The advertisement in MUR 7174 can be found here: <https://www.youtube.com/watch?v=4kBJw8r-U>. The advertisement in MUR 7176 can be found here: <https://www.youtube.com/watch?v=WCx3ObETyrE>. The advertisement in MUR 7182 can be found here: <https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be>.

¹¹ See Exhibit B.

¹² The advertisement in MUR 7172 can be found here: <https://www.youtube.com/watch?v=nwdIjKSaFdQ>. The advertisement in MUR 7175 can be found here: <https://www.youtube.com/watch?v=GJCZwJ3tYXw>. The advertisement in MUR 7177 can be found here: <https://www.youtube.com/watch?v=7KxcnucjChU&feature=youtu.be>. The advertisement in MUR 7178 can be found here: <https://www.youtube.com/watch?v=HixNUxf-t8Q>. The advertisement in MUR 7179 can be found here: <https://www.youtube.com/watch?v=OpdlIznhrF4>. The advertisement in MUR 7188 can be found here: <https://www.youtube.com/watch?v=epFwW3WvQWn>. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

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determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit.¹³

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents.¹⁴ Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents.¹⁵ The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement.¹⁶ The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor.¹⁷

LEGAL ANALYSIS

I. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived

A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that “expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived.”¹⁸ For a television ad, the regulation is explicit about how to make this attribution: it “shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates.”¹⁹ The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates.²⁰ For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).²¹ The portions of the broadcast communication that is dedicated to the legally

¹³ The advertisement in MUR 7173 can be found here: <https://www.youtube.com/watch?v=RriiljNAe-I>. The advertisement in MUR 7187 can be found here: <https://www.youtube.com/watch?v=8DNQEGLEECA>. See Exhibit B.

¹⁴ See Exhibit A.

¹⁵ *Id.*

¹⁶ *Id.*; see also Exhibit C (affidavit of media vendors).

¹⁷ The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C.

¹⁸ 11 C.F.R. § 106.1(a).

¹⁹ *Id.*

²⁰ See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) (“attribution shall be determined by the proportion of space devoted to each candidate”) (citing 11 C.F.R. § 106.1(a)(1)).

²¹ FEC Adv. Op. 2010-10 (NRL PAC).

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measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates.”²⁸

Although the ads aired by Respondents are not so-called “hybrid” ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act “generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose” and “allocation is an appropriate way to fund activities with multiple purposes” as held over and over by the Commission.²⁹ These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump’s defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

B. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by “the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates.” The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are “allocated among the electoral races, based on a time or space analysis.”³⁰ This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races “in the same proportion as the time or space” devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

²⁸ *Id.* at 4.

²⁹ See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that “expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a ‘reasonable basis’”); First General Counsel’s Report at 22, FEC Matter Under Review 4131 (holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes).

³⁰ FEC Adv. Op. 2010-10 (NRL PAC).

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Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.³¹ The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172.³² The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

C. *The expenses attributed to the House candidates were correctly reported.*

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases—the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission.³³ The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

³¹ Jirn Mowrer, *Now We Understand*, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g_4kBjw8r-U.

³² Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), <https://www.youtube.com/watch?v=Ch4ToJp3Br0>.

³³ See Exhibit B.

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that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution results from the payment of the remaining portion of the expenses for the advertising.³⁴

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.³⁵

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.³⁶

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

II. The Portions of the Ads Attributable to Donald Trump Were Correctly Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

³⁴ See FEC Adv. Op. 2004-37 (Waters) at 2 (holding that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

³⁵ See Exhibit B.

³⁶ *Id.*

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.³⁷ However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him.³⁸ In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.³⁹

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure.⁴⁰

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate.⁴¹ A message constitutes express advocacy "only if it contains a clear call to a specific electoral

³⁷ 11 C.F.R. § 100.16.

³⁸ *Dangerous for PA Women*, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), <https://www.youtube.com/watch?v=7mb2DsovG00>; Ruben Kihuen for Congress, *Our Values*, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"), <https://www.youtube.com/watch?v=uilkinwN7ivMLU>; Nelson for Wisconsin, *No*, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), <https://www.youtube.com/watch?v=LS-gU95vm9U>; Jim Mowrer, *Now We Understand*, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"), https://www.youtube.com/watch?v=g_4kBjw8r-U; Suzanna Shkreli for Congress, *Braggs*, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), <https://www.youtube.com/watch?v=WCx3ObETyrE>; Bryan Caforio for Congress, *Stand Up*, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), <https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be>.

³⁹ See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication").

⁴⁰ See, e.g., FEC Adv. Op. 1985-14 (DCCC).

⁴¹ 11 C.F.R. § 100.22.

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action.”⁴² Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be “express advocacy of the election or defeat of a clearly identified candidate” when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act’s disclosure requirements.⁴³

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates “support” for Donald Trump’s positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump’s approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: “I love war in a certain way.”

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: “I absolutely will support.”

TRUMP: “Tell them to go f--- themselves.”

VOICE OVER: When national security leaders condemn Trump’s reckless statements on foreign policy...

INTERVIEWER: “People are wondering how those things can happen and you not flat out denounce it?”

KATKO: “I’m more concerned about my race.”

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].⁴⁴

⁴² Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

⁴³ *FEC v. Furgatch*, 807 F.2d 857, 864 (9th Cir. 1987).

⁴⁴ Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), <https://www.youtube.com/watch?v=Ch4ToJp3BrQ>.

However, the word “support” in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump’s desire for war, dangerous foreign policy “approach,” and other previous actions and policy positions and Representative Katko’s support of Trump despite these positions. This advertisement concludes with the statement that “Trump and Katko put our national security at risk.” The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States’ national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We’re going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He’s a Mexican. We’re building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He’s the wrong choice for Texas families.

[DISCLAIMER].⁴⁵

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are “tearing us apart” at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the “wrong choice for Texas families” because of his support of Donald Trump’s positions. Citing Representative Hurd’s support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no “express advocacy” or “clear call to a specific electoral action” with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

⁴⁵ *Wrong Choice for TX Families*, YouTube (Oct. 4, 2015), <https://www.youtube.com/watch?v=GJCZwI3tYXw>.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures.⁴⁶

III. The Complaint Presents No Genuine Allegation of Coordination with HFA, and The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.⁴⁷

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act.⁴⁸ For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination."⁴⁹ The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act through impermissible coordination.⁵⁰ Because the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads.⁵¹ The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important.⁵² Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

⁴⁶ FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

⁴⁷ See Exhibit A.

⁴⁸ Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001).

⁴⁹ FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

⁵⁰ FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000).

⁵¹ See Exhibits A and C.

⁵² See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.⁵³

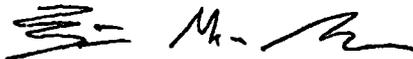
Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

CONCLUSION

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,



Marc E. Elias
Brian G. Svoboda
Graham M. Wilson
Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer
Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer
Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer
Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer
Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

⁵³ *Id.*

17044443282

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer
Texans for Pete and Wayne Alexander, in his official capacity as treasurer
Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer
Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer
Eggman for Congress and Jay Petterson, in his official capacity as treasurer
Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer
Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer
Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as
treasurer
LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer

17044434821

Exhibit A

17084444071

BEFORE THE
FEDERAL ELECTION COMMISSION
DECLARATION OF MICHAEL IAN RUSSELL

I, Michael Ian Russell, do declare and state as follows:

1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kihuen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for Iowa on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR 7176 (j) Carroll for Colorado on the advertisement discussed in the complaint in MUR 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR 7178 (l) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

1708444407

- 420014144001
5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
 6. To the best of my knowledge, and consistent with the instructions I gave, these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
 - i. the content of any Advertisement;
 - ii. the intended audience for any Advertisement;
 - iii. the means or mode of any Advertisement;
 - iv. the specific media outlet used for any Advertisement;
 - v. the timing or frequency of any Advertisement; or
 - vi. the duration of any Advertisements.
 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities, or needs concerning any Advertisement.
 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 21st day of December, 2016.

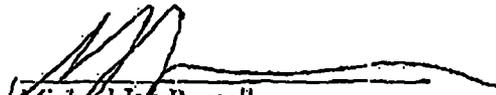

Michael Ian Russell

Exhibit B

1-10-2014 10:00 AM

SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full) DCCC					
Has your committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Full Name of Subordinate Committee DCCC			
If YES, name the designating committee: Democratic National Committee & Michigan Democratic Party		Mailing Address 430 South Capitol Street, SE 2nd Floor			
City Washington		State DC	ZIP Code 20003-4024		
Full Name (Last, First, Middle Initial) of Each Payee Three Point Media, LLC		Memo Item		Purpose of Expenditure Media Services	
Mailing Address 1900 Potomac Street, NW Suite 500				Category/ Type	
City Washington		State DC	Date 10 13 2016		
Zip Code 20007				Amount 1000.00	
Name of Federal Candidate Supported Driskell, Gretchen, . . .		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: MI	District: 07	
Aggregate General Election Expenditure for this Candidate ▶		96200.00		Transaction ID : SF-951470	
Full Name (Last, First, Middle Initial) of Each Payee Mundy Katowitz Media, Inc		Memo Item		Purpose of Expenditure Media Services	
Mailing Address 1322 G Street, SE				Category/ Type	
City Washington		State DC	Date 10 13 2016		
Zip Code 20003				Amount 95200.00	
Name of Federal Candidate Supported Driskell, Gretchen, . . .		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: MI	District: 07	
Aggregate General Election Expenditure for this Candidate ▶		96200.00		Transaction ID : SF-951459	
Full Name (Last, First, Middle Initial) of Each Payee Buying Time, LLC		Memo Item		Purpose of Expenditure Media Services	
Mailing Address 650 Massachusetts Avenue, NW Suite 210				Category/ Type	
City Washington		State DC	Date 10 17 2016		
Zip Code 20001				Amount 52960.00	
Name of Federal Candidate Supported Shkroli, Suzanna, . . .		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: MI	District: 08	
Aggregate General Election Expenditure for this Candidate ▶		52960.00		Transaction ID : SF-952064	
SUBTOTAL of Expenditures This Page (optional).....▶					149160.00
TOTAL This Period (last page this line number only).....▶					

**SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full) DCCC					
Has your committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If YES, name the designating committee: Democratic National Committee		Full Name of Subordinate Committee DCCC			
		Mailing Address 430 South Capitol Street, SE 2nd Floor			
City Washington		State DC	ZIP Code 20003-4024		
Full Name (Last, First, Middle Initial) of Each Payee <input type="checkbox"/> Memo Item Buying Time, LLC					Purpose of Expenditure Media Services
Mailing Address 850 Massachusetts Avenue, NW Suite 210					Category/ Type
City Washington		State DC	Zip Code 20001		Date 10 / 11 / 2018
Name of Federal Candidate Supported Nelson, Tom, . .		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>WI</u> District: <u>08</u>		Amount 32700.00
Aggregate General Election Expenditure for this Candidate ▶ 32700.00 Transaction ID : SF-951664					
Full Name (Last, First, Middle Initial) of Each Payee <input type="checkbox"/> Memo Item Adelstein & Associates LLC					Purpose of Expenditure Media Services
Mailing Address 222 West Ontario Street, Suite 600					Category/ Type
City Chicago		State IL	Zip Code 60654		Date 10 / 13 / 2016
Name of Federal Candidate Supported Schneider, Bradley, Scott, .		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>IL</u> District: <u>10</u>		Amount 48100.00
Aggregate General Election Expenditure for this Candidate ▶ 48100.00 Transaction ID : SF-951461					
Full Name (Last, First, Middle Initial) of Each Payee <input type="checkbox"/> Memo Item					Purpose of Expenditure
Mailing Address					Category/ Type
City		State	Zip Code		Date
Name of Federal Candidate Supported		Office Sought:	House Senate Presidential		State: District:
Amount					
Aggregate General Election Expenditure for this Candidate ▶					
SUBTOTAL of Expenditures This Page (optional).....▶ 80800.00					
TOTAL This Period (last page this line number only).....▶ 1516806.99					

11034114100010

SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full) DCCC			
Has your committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Full Name of Subordinate Committee DCCC	
If YES, name the designating committee: Democratic National Committee & California Democratic Party		Mailing Address 430 South Capitol Street, SE 2nd Floor	
City Washington		State DC	ZIP Code 20003-4024
Full Name (Last, First, Middle Initial) of Each Payee The New Media Firm, Inc.		Memo Item	Purpose of Expenditure Media Services
Mailing Address 1730 Rhode Island Ave., NW Suite 213			Category/ Type
City Washington	State DC	Zip Code 20036	Date 09 20 2016
Name of Federal Candidate Supported Applegate, Doug, Loren, .	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>CA</u> District: <u>49</u>	Amount 91200.00
Aggregate General Election Expenditure for this Candidate ▶ 91200.00		Transaction ID : SF-949904	
Full Name (Last, First, Middle Initial) of Each Payee Screen Strategies Media, LLC		Memo Item	Purpose of Expenditure Media Services
Mailing Address 11150 Fairfax Blvd Suite 505			Category/ Type
City Fairfax	State VA	Zip Code 22030	Date 09 23 2016
Name of Federal Candidate Supported Calorio, Bryan, . .	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>CA</u> District: <u>25</u>	Amount 46490.00
Aggregate General Election Expenditure for this Candidate ▶ 96200.00		Transaction ID : SF-950014	
Full Name (Last, First, Middle Initial) of Each Payee Screen Strategies Media, LLC		Memo Item	Purpose of Expenditure Media Services
Mailing Address 11150 Fairfax Blvd Suite 505			Category/ Type
City Fairfax	State VA	Zip Code 22030	Date 09 28 2016
Name of Federal Candidate Supported Calorio Bryan, . .	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>CA</u> District: <u>25</u>	Amount 13431.04
Aggregate General Election Expenditure for this Candidate ▶ 96200.00		Transaction ID : SF-950737	
SUBTOTAL of Expenditures This Page (optional)..... ▶			151121.04
TOTAL This Period (last page this line number only)..... ▶			

1-800-424-9546

BEFORE THE
FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7179

I, Maura Johnson, do declare and state as follows:

1. During the 2016 election, as a Media Supervisor at GMMB, Inc. ("GMMB"), I provided media buying services for Ralston Lapp Media, the consultant working with Stephanie Murphy for Congress. Through that position, I am familiar with the matters discussed herein.
2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

Mj 12/21/16

133958413.1

133958413.1

- i. the content of the Advertisement;
 - ii. the intended audience for the Advertisement;
 - iii. the means or mode of the Advertisement;
 - iv. the specific media outlet used for the Advertisement;
 - v. the timing or frequency of the Advertisement; or
 - vi. the duration of the Advertisement.
6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 21 day of December, 2016:


Maura Johnson

BEFORE THE
FEDERAL ELECTION COMMISSION

**DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA
GROUP LLC - MUR 7188**

David Dixon and Richard Davis do declare and state as follows:

1. During the 2016 election, we were partners at the Dixon/Davis Media Group LLC ("Dixon/Davis"). Through that position, we are familiar with the matters discussed herein.
2. At the request of DCCC, and with the guidance of DCCC and their legal counsel, Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce, and distribute an advertisement discussed in the complaint in FEC Matter Under Review 7188 (the "Advertisement").
3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:
 - i. the content of the Advertisement;

UNCLASSIFIED

- ii. the intended audience for the Advertisement;
 - iii. the means or mode of the Advertisement;
 - iv. the specific media outlet used for the Advertisement;
 - v. the timing or frequency of the Advertisement; or
 - vi. the duration of the Advertisement.
6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd day of December, 2016.



David Dixon



Richard Davis

Exhibit D

INFORMATION

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C0000935
-------------------------------------	---------------------------------------

Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee Old Towne Media Date of Dissemination: 10/18/16	Date of Public Distribution/Dissemination 10 18 2016
Mailing Address 4507 Penwood Dr	Amount 48000.00
City State Zip Code Alexandria VA 22310	Transaction ID: SE-952383 Date of Disbursement or Obligation 10 18 2016
Purpose of Expenditure Media Buy Category/Type 004	
Name of Federal Candidate Donald J. Trump <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

Full Name of Payee AL Media, LLC Date of Dissemination: 10/19/16	Date of Public Distribution/Dissemination 10 19 2016
Mailing Address 222 West Ontario West Suite 600	Amount 81321.00
City State Zip Code Chicago IL 60654	Transaction ID: SE-952887 Date of Disbursement or Obligation 10 14 2016
Purpose of Expenditure Media Buy Category/Type 004	
Name of Federal Candidate Donald J. Trump <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	129321.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	273146.39

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature *Kelly C. Ward* Date 10 21 2016

170444343007

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
-------------------------------------	--

Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee AL Media LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination 10 25 2016
Mailing Address 222 W Ontario St Suite 600	Amount 9000.00
City Chicago State IL Zip Code 60654	Transaction ID : SE-953228 Date of Disbursement or Obligation 10 24 2016
Purpose of Expenditure Media Buy	Category/Type 004
Name of Federal Candidate Donald J. Trump	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

Full Name of Payee Canal Partners Media, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination 10 25 2016
Mailing Address 25 Whitlock Place Suite 200	Amount 184082.00
City Marietta State GA Zip Code 30064	Transaction ID : SE-952497 Date of Disbursement or Obligation 10 19 2016
Purpose of Expenditure Media Buy	Category/Type 004
Name of Federal Candidate Donald J. Trump	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	193082.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Kelly C. Ward

Date 10 25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
-------------------------------------	--

Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee Moore Campaigns, LLC		Date of Public Distribution/Dissemination 10 28 2016	
Mailing Address 447 Irving St, NW		Amount 4472.36	
City Washington	State DC	Zip Code 20010	Transaction ID: SE-954234
Purpose of Expenditure Mail Services	Category/Type 000	Date of Disbursement or Obligation 10 27 2016	
Name of Federal Candidate Donald J. Trump	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate	District: 00 State:
Calendar Year-To-Date Per Election for Office Sought 4593586.81	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)		

Full Name of Payee AL Media LLC		Date of Public Distribution/Dissemination 10 28 2016	
Mailing Address 222 W Ontario St Suite 600		Amount 30525.00	
City Chicago	State IL	Zip Code 60654	Transaction ID: SE-853928
Purpose of Expenditure Media Buy	Category/Type 004	Date of Disbursement or Obligation 10 28 2016	
Name of Federal Candidate Donald J. Trump	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate	District: 00 State:
Calendar Year-To-Date Per Election for Office Sought 4593586.81	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)		

(a) SUBTOTAL of Itemized Independent Expenditures.....	34997.36
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	1588663.18

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Kelly C. Ward Date 10 29 2016

1704444000

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC		FEC IDENTIFICATION NUMBER C 00000935
Check if <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on		

Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16		Date of Public Distribution/Dissemination 10 / 31 / 2016
Mailing Address 222 West Ontario Street, Suite 600		Amount 80000.00
City Chicago State IL Zip Code 60654	Purpose of Expenditure Media Buy	Transaction ID : SE-954371 Date of Disbursement or Obligation 10 / 28 / 2016
Category/Type 004	Name of Federal Candidate Trump, Donald, J.,	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State: _____
Calendar Year-To-Date Per Election for Office Sought 4979620.65	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶	

Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16		Date of Public Distribution/Dissemination 10 / 31 / 2016
Mailing Address 222 West Ontario Street, Suite 600		Amount 67387.50
City Chicago State IL Zip Code 60654	Purpose of Expenditure Media Buy	Transaction ID : SE-954372 Date of Disbursement or Obligation 10 / 28 / 2016
Category/Type 004	Name of Federal Candidate Trump, Donald, J.,	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State: _____
Calendar Year-To-Date Per Election for Office Sought 4979620.65	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶	

(a) SUBTOTAL of Itemized Independent Expenditures.....	147387.50
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Ward, Kelly, C., [Electronically Filed] Date **10 / 31 / 2016**

1708444404

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
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Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination 11 / 04 / 2016
Mailing Address 11150 Fairfax Blvd Suite 505	Amount 40000.00
City State Zip Code Fairfax VA 22030	Transaction ID : SE-954176 Date of Disbursement or Obligation 10 / 27 / 2016
Purpose of Expenditure Media Buy Category/Type 004	
Name of Federal Candidate Trump, Donald, J., <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 6419383.70	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

Full Name of Payee AL Media LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination 11 / 04 / 2016
Mailing Address 222 W Ontario St Suite 600	Amount 3750.00
City State Zip Code Chicago IL 60654	Transaction ID : SE-954988 Date of Disbursement or Obligation 11 / 04 / 2016
Purpose of Expenditure Media Buy Category/Type 004	
Name of Federal Candidate Trump, Donald, J., <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 6419383.70	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	43750.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Ward, Kelly, C., [Electronically Filed] Date 11 / 04 / 2016

17044434846

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC
FEC IDENTIFICATION NUMBER C00000935

Check if [X] 24-hour report [] 48-hour report [X] New report [] Amends report filed on

Full Name of Payee Screen Strategies Media, LLC
Date of Dissemination: 11/04/16
Mailing Address 11150 Fairfax Blvd Suite 505
City Fairfax State VA Zip Code 22030
Purpose of Expenditure Media Buy Category/Type 004

Date of Public Distribution/Dissemination 11/04/2016
Amount 13000.00
Transaction ID: SE-954882
Date of Disbursement or Obligation 11/03/2016

Name of Federal Candidate Trump, Donald, J.,
[] Support [X] Oppose

Office Sought: [] House District: 00
[X] President [] Senate State:

Calendar Year-To-Date Per Election for Office Sought 6419383.70

Disbursement For: [] Primary [X] General 2016
[] Other (specify)

Full Name of Payee The New Media Firm, Inc.
Date of Dissemination: 11/04/16
Mailing Address 1730 Rhode Island Ave., NW Suite 213
City Washington State DC Zip Code 20036
Purpose of Expenditure Media Buy Category/Type 004

Date of Public Distribution/Dissemination 11/04/2016
Amount 46000.00
Transaction ID: SE-954883
Date of Disbursement or Obligation 11/03/2016

Name of Federal Candidate Trump, Donald, J.,
[] Support [X] Oppose

Office Sought: [] House District: 00
[X] President [] Senate State:

Calendar Year-To-Date Per Election for Office Sought 6419383.70

Disbursement For: [] Primary [X] General 2016
[] Other (specify)

Table with 2 columns: Description and Amount. (a) SUBTOTAL of Itemized Independent Expenditures 59000.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Ward, Kelly, C., [Electronically Filed] Date 11/04/2016

17044434847

**SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 109024 OF 109107
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼ C C00000935
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Check if: 24-hour report 48-hour report New report Amends report filed on

17044434884

Full Name of Payer: Screen Strategies Media, LLC	Memo Item	Date of Public Distribution/Dissemination 11 07 2016
Date of Dissemination: 11/07/16 - 24 hours prior to election day		Amount 38173.50
Mailing Address 11150 Fairfax Blvd Suite 505		Transaction ID: SE-954644 Date of Disbursement or Obligation
City Fairfax	State VA	Zip Code 22030
Purpose of Expenditure Media Buy	Category/ Type 004	11 01 2016
Name of Federal Candidate: Trump, Donald, J.,	Support <input checked="" type="checkbox"/> Oppose	Office Sought: House District: _____ <input checked="" type="checkbox"/> President Senate State: _____
Calendar Year-To-Date Per Election for Office Sought	6693372.69	Disbursement For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> 2016 Other (specify) ▶ _____

Full Name of Payer: The New Media Firm, Inc.	Memo Item	Date of Public Distribution/Dissemination 11 01 2016
Date of Dissemination: 11/01/16		Amount 3556.00
Mailing Address 1730 Rhode Island Ave., NW Suite 213		Transaction ID: SE-954643 Date of Disbursement or Obligation
City Washington	State DC	Zip Code 20036
Purpose of Expenditure Media Production	Category/ Type 004	11 01 2016
Name of Federal Candidate: Trump, Donald, J.,	Support <input checked="" type="checkbox"/> Oppose	Office Sought: House District: _____ <input checked="" type="checkbox"/> President Senate State: _____
Calendar Year-To-Date Per Election for Office Sought	6693372.69	Disbursement For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> 2016 Other (specify) ▶ _____

(a) SUBTOTAL of Itemized Independent Expenditures	41739.50
(a) SUBTOTAL of Unitemized Independent Expenditures	
(a) TOTAL Independent Expenditures	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Ward Kohn, C. [Electronically Filed] Date 12 08 2016
Signature

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

PAGE 51 OF 52
FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C C00000935
Check if <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/18/16		Date of Public Distribution/Dissemination 10 18 2016	
Mailing Address 11150 Fairfax Blvd Suite 505		Amount 134898.50	
City Fairfax	State VA	Zip Code 22030	Transaction ID : SE-952377 Date of Disbursement or Obligation 10 11 2016
Purpose of Expenditure Media Buy		Category/ Type 004	
Name of Federal Candidate Donald J. Trump		Support <input checked="" type="checkbox"/> Oppose	Office Sought: House District: 00 <input checked="" type="checkbox"/> President Senate State:
Calendar Year To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary <input checked="" type="checkbox"/> General 2016 Other (specify)

Full Name of Payee Kully Hali, LLC Date of Dissemination: 10/18/16		Date of Public Distribution/Dissemination 10 18 2016	
Mailing Address 1932 1st Ave, Suite 203		Amount 6225.00	
City Seattle	State WA	Zip Code 98101	Transaction ID : SE-952379 Date of Disbursement or Obligation 10 18 2016
Purpose of Expenditure Media Buy Media Production		Category/ Type	
Name of Federal Candidate Donald J. Trump		Support <input checked="" type="checkbox"/> Oppose	Office Sought: House District: 00 <input checked="" type="checkbox"/> President Senate State:
Calendar Year To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary <input checked="" type="checkbox"/> General 2016 Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	141123.50
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Kelly C. Ward Date 10 19 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
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Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee Buying Time, LLC Date of Dissemination: 10/11/16	Date of Public Distribution/Dissemination 10 11 2016
Mailing Address 850 Massachusetts Avenue, NW Suite 210	Amount 57500.00
City Washington State DC Zip Code 20001	Transaction ID: SE-951439 Date of Disbursement or Obligation 10 11 2016
Purpose of Expenditure Media Buy Category/Type 004	
Name of Federal Candidate Trump, Donald, J., <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 1459931.62	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination 10 12 2016
Mailing Address 11150 Fairfax Blvd Suite 505	Amount 74632.00
City Fairfax State VA Zip Code 22030	Transaction ID: SE-951438 Date of Disbursement or Obligation 10 11 2016
Purpose of Expenditure Media Buy Category/Type 004	
Name of Federal Candidate Trump, Donald, J., <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 1534563.62	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	132132.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	170032.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature *Ward, Kelly, C.* [Electronically Filed] Date 10 13 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C C00000935
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Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/20/16	Date of Public Distribution/Dissemination 10 20 2016
Mailing Address 11150 Fairfax Blvd Suite 505	Amount 107040.00
City State Zip Code Fairfax VA 22030	Transaction ID: SE-952389 Date of Disbursement or Obligation 10 18 2016
Purpose of Expenditure Media Buy	Category/Type 004
Name of Federal Candidate Donald J. Trump	Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought	2989611.20 Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

Full Name of Payee AL Media LLC Date of Dissemination: 10/20/16	Date of Public Distribution/Dissemination 10 20 2016
Mailing Address 222 W Ontario St Suite 600	Amount 140250.00
City State Zip Code Chicago IL 60654	Transaction ID: SE-952071 Date of Disbursement or Obligation 10 17 2016
Purpose of Expenditure Media Buy	Category/Type 004
Name of Federal Candidate Donald J. Trump	Support <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought	2989611.20 Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures..... 247290.00
 (b) SUBTOTAL of Unitemized Independent Expenditures
 (c) TOTAL Independent Expenditures..... 652070.38

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Kelly C. Ward
Signature

Date 10 21 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
Check if <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	

Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination 10 / 12 / 2016
Mailing Address 1730 Rhode Island Ave., NW Suite 213	Amount 4047.25
City State Zip Code Washington DC 20036	
Purpose of Expenditure Media Buy Media Production	Transaction ID : SE-951654 Date of Disbursement or Obligation 10 / 12 / 2016
Name of Federal Candidate Trump, Donald, J.,	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate District: 00 State:
Calendar Year-To-Date Per Election for Office Sought 1721688.30	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination 10 / 12 / 2016
Mailing Address 11150 Fairfax Blvd Suite 505	Amount 121850.00
City State Zip Code Fairfax VA 22030	
Purpose of Expenditure Media Buy	Transaction ID : SE-951660 Date of Disbursement or Obligation 10 / 12 / 2016
Name of Federal Candidate Trump, Donald, J.,	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate District: 00 State:
Calendar Year-To-Date Per Election for Office Sought 1721688.30	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶

(a) SUBTOTAL of Itemized Independent Expenditures.....	125897.25
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Ward, Kelly, C., , [Electronically Filed] Date 10 / 14 / 2016

Signature

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC		FEC IDENTIFICATION NUMBER C 00000935
Check if <input type="checkbox"/> 24-hour report	<input checked="" type="checkbox"/> 48-hour report	<input type="checkbox"/> New report <input checked="" type="checkbox"/> Amends report filed on 10/14/2016

Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16		Date of Public Distribution/Dissemination 10/12/2016
Mailing Address 1730 Rhode Island Ave., NW Suite 213		Amount 4047.25
City Washington	State DC	Zip Code 20036
Purpose of Expenditure Media Buy Media Production	Category/Type	Transaction ID : SE-952372 Date of Disbursement or Obligation 10/14/2016
Name of Federal Candidate Trump, Donald, J..	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 1856586.80		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16		Date of Public Distribution/Dissemination 10/12/2016
Mailing Address 11150 Fairfax Blvd Suite 505		Amount 121850.00
City Fairfax	State VA	Zip Code 22030
Purpose of Expenditure Media Buy	Category/Type 004	Transaction ID : SE-952373 Date of Disbursement or Obligation 10/14/2016
Name of Federal Candidate Trump, Donald, J..	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:
Calendar Year-To-Date Per Election for Office Sought 1856586.80		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	125897.25
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Ward, Kelly, C..

[Electronically Filed]

Date 10/18/2016

Signature

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
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Check if 24-hour report 48-hour report New report Amends report filed on _____

Full Name of Payee Buying Time, LLC Date of Dissemination: 11/01/16		Date of Public Distribution/Dissemination 11 / 01 / 2016	
Mailing Address 850 Massachusetts Avenue, NW Suite 210		Amount 7175.00	
City Washington	State DC	Zip Code 20001	Transaction ID : SE-954373
Purpose of Expenditure Media Buy	Category/Type 004	Date of Disbursement or Obligation 10 / 28 / 2016	
Name of Federal Candidate Donald J. Trump		Office Sought: <input type="checkbox"/> House District: 00	
		<input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State: _____	
Calendar Year-To-Date Per Election for Office Sought 5894458.07		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶	

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/01/16		Date of Public Distribution/Dissemination 11 / 01 / 2016	
Mailing Address 11150 Fairfax Blvd Suite 505		Amount 74850.00	
City Fairfax	State VA	Zip Code 22030	Transaction ID : SE-954175
Purpose of Expenditure Media Buy	Category/Type 004	Date of Disbursement or Obligation 10 / 27 / 2016	
Name of Federal Candidate Donald J. Trump		Office Sought: <input type="checkbox"/> House District: 00	
		<input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State: _____	
Calendar Year-To-Date Per Election for Office Sought 5894458.07		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶	

(a) SUBTOTAL of Itemized Independent Expenditures.....	92025.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	14333615.05

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Kelly C. Ward Date 11 / 02 / 2016

CONFIDENTIAL

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC		FEC IDENTIFICATION NUMBER C00000935
Check <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on		MM / DD / YYYY

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/05/16		Date of Public Distribution/Dissemination MM / DD / YYYY 11 / 05 / 2016
Mailing Address 11150 Fairfax Blvd Suite 505		Amount 58700.00
City Fairfax State VA Zip Code 22030	Purpose of Expenditure Media Buy Category/Type 004	Transaction ID : SE-954453 Date of Disbursement or Obligation MM / DD / YYYY 10 / 31 / 2016
Name of Federal Candidate Trump, Donald, J., <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate	District: 00 State: _____
Calendar Year-To-Date Per Election for Office Sought 6526208.19	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶	

Full Name of Payee Canal Partners Media, LLC Date of Dissemination: 11/06/16		Date of Public Distribution/Dissemination MM / DD / YYYY 11 / 06 / 2016
Mailing Address 25 Whitlock Place Suite 200		Amount 7910.00
City Marietta State GA Zip Code 30064	Purpose of Expenditure Media Buy Category/Type 004	Transaction ID : SE-954884 Date of Disbursement or Obligation MM / DD / YYYY 11 / 03 / 2016
Name of Federal Candidate Trump, Donald, J., <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate	District: 00 State: _____
Calendar Year-To-Date Per Election for Office Sought 6648199.19	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶	

(a) SUBTOTAL of Itemized Independent Expenditures.....▶	66610.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....▶	
(c) TOTAL Independent Expenditures.....▶	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Ward, Kelly, C... [Electronically Filed] Date **11 / 06 / 2016**

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (in Full) DCCC
FEC IDENTIFICATION NUMBER C00000935

Check if [] 24-hour report [x] 48-hour report [] New report [x] Amends report filed on 10/14/2016

Full Name of Payee Ralston Lapp Media, LLC
Mailing Address 1054 31st Street, NW Suite 430
City Washington State DC Zip Code 20007
Purpose of Expenditure Media Production Category/Type 004

Date of Public Distribution/Dissemination 10/14/2016
Amount 12260.71
Transaction ID: SE-951677
Date of Disbursement or Obligation 10/14/2016

Name of Federal Candidate Hurd, William, . . .
[] Support [x] Oppose

Office Sought: [x] House District: 23
[] President [] Senate State: TX

Calendar Year-To-Date Per Election for Office Sought 1648833.65

Disbursement For: [] Primary [x] General 2016 [] Other (specify)

Full Name of Payee Buying Time, LLC
Mailing Address 650 Massachusetts Avenue, NW Suite 210
City Washington State DC Zip Code 20001
Purpose of Expenditure Media Buy Category/Type 004

Date of Public Distribution/Dissemination 10/14/2016
Amount 53000.00
Transaction ID: SE-952374
Date of Disbursement or Obligation 10/13/2016

Name of Federal Candidate Trump, Donald, J. . .
[] Support [x] Oppose

Office Sought: [] House District: 00
[x] President [] Senate State:

Calendar Year-To-Date Per Election for Office Sought 1919459.68

Disbursement For: [] Primary [x] General 2016 [] Other (specify)

Table with 2 columns: Description and Amount. (a) SUBTOTAL of Itemized Independent Expenditures 65260.71; (b) SUBTOTAL of Unitemized Independent Expenditures; (c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Ward, Kelly, C. . . [Electronically Filed] Date 10/18/2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) DCCC		FEC IDENTIFICATION NUMBER C00000935	
Check if <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on			

Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/18/16		
Mailing Address 1730 Rhode Island Ave., NW Suite 213		
City Washington	State DC	Zip Code 20036
Purpose of Expenditure Media Buy Media Production		Category/Type

Date of Public Distribution/Dissemination 10 / 18 / 2016
Amount 3407.87
Transaction ID : SE-952382
Date of Disbursement or Obligation 10 / 18 / 2016

Name of Federal Candidate Trump, Donald, J.,	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 2613000.20	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State: _____

Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶
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Full Name of Payee Buying Time, LLC Date of Dissemination: 10/18/16		
Mailing Address 650 Massachusetts Avenue, NW Suite 210		
City Washington	State DC	Zip Code 20001
Purpose of Expenditure Media Buy		Category/Type 004

Date of Public Distribution/Dissemination 10 / 18 / 2016
Amount 83829.00
Transaction ID : SE-952073
Date of Disbursement or Obligation 10 / 17 / 2016

Name of Federal Candidate Trump, Donald, J.,	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 2613000.20	Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State: _____

Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify) ▶
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(a) SUBTOTAL of Itemized Independent Expenditures.....	87236.87
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures.....	11152409.38

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Ward, Kelly, C., [Electronically Filed] Date **10 / 19 / 2016**
Signature

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

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FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER C00000935
Check <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	

Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/25/16 Mailing Address 11150 Fairfax Blvd Suite 505 City Fairfax State VA Zip Code 22030 Purpose of Expenditure Media Buy Category/Type 004	Date of Public Distribution/Dissemination 10 25 2016 Amount 64326.00 Transaction ID: SE-953184 Date of Disbursement or Obligation 10 21 2016
Name of Federal Candidate Donald J. Trump <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)
Calendar Year-To-Date Per Election for Office Sought 4369947.93	

Full Name of Payee Buying Time, LLC Date of Dissemination: 10/25/16 Mailing Address 650 Massachusetts Avenue, NW Suite 210 City Washington State DC Zip Code 20001 Purpose of Expenditure Media Buy Category/Type 004	Date of Public Distribution/Dissemination 10 25 2016 Amount 62488.00 Transaction ID: SE-953185 Date of Disbursement or Obligation 10 21 2016
Name of Federal Candidate Donald J. Trump <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose Office Sought: <input type="checkbox"/> House District: 00 <input checked="" type="checkbox"/> President <input type="checkbox"/> Senate State:	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2016 <input type="checkbox"/> Other (specify)
Calendar Year-To-Date Per Election for Office Sought 4369947.03	

(a) SUBTOTAL of Itemized Independent Expenditures.....	126814.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature *Kelly C. Ward* Date 10 25 2016

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